

Message

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**From:** Sandoval, Adrienne [Adrienne.Sandoval@andeavor.com]  
**Sent:** 4/3/2018 9:23:04 PM  
**To:** Moon, Diane [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=a3daf632c7894a269c682e1e8ab5879a-Moon, Diane]; Davis, Patrick [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7fca02d1ec544fbbbd6fb2e7674e06b2-Davis, Patr]  
**Subject:** RE: Site Tour Invitation

Thanks for the update Diane.

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**From:** Moon, Diane [mailto:Moon.Diane@epa.gov]  
**Sent:** Tuesday, April 03, 2018 12:55 PM  
**To:** Sandoval, Adrienne <Adrienne.Sandoval@andeavor.com>; Davis, Patrick <davis.patrick@epa.gov>  
**Subject:** RE: Site Tour Invitation

Adrienne,  
Thank you for your invitation.

We do not have any specific dates as yet, but Mr. Benevento wanted to wait to plan tours until late spring early summer.

As soon as planning begins, we will get in touch with you to decide on a date that works for Rock Springs.

Thank you.

*Diane Rene Moon*  
*Staff Assistant to the Regional Administrator*  
*Office of the Regional Administrator (8RA)*  
*1595 Wynkoop Street*  
*Denver, Colorado 80202*

**Ex. 6**

[moon.diane@epa.gov](mailto:moon.diane@epa.gov)

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**From:** Sandoval, Adrienne [mailto:Adrienne.Sandoval@andeavor.com]  
**Sent:** Tuesday, April 3, 2018 12:12 PM  
**To:** Davis, Patrick <[davis.patrick@epa.gov](mailto:davis.patrick@epa.gov)>  
**Cc:** Moon, Diane <[Moon.Diane@epa.gov](mailto:Moon.Diane@epa.gov)>  
**Subject:** RE: Site Tour Invitation

Hi Patrick-

I wanted to check back in with you and see if you had any questions regarding the potential site tour? We are decently flexible date wise but if you would be able to propose a couple different options we could choose one that works best for everyone.

I look forward to speaking with you again.

Thanks

**Adrienne Sandoval | Federal Regulatory Issues Specialist**  
Andeavor | 1801 California St. Suite 1200 Denver, CO 80202  
Office: **Ex. 6** Mobile: **Ex. 6** [Adrienne.Sandoval@andeavor.com](mailto:Adrienne.Sandoval@andeavor.com)

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**From:** Davis, Patrick [<mailto:davis.patrick@epa.gov>]  
**Sent:** Friday, March 16, 2018 11:23 AM  
**To:** Sandoval, Adrienne <[Adrienne.Sandoval@andeavor.com](mailto:Adrienne.Sandoval@andeavor.com)>  
**Cc:** Moon, Diane <[Moon.Diane@epa.gov](mailto:Moon.Diane@epa.gov)>  
**Subject:** RE: Site Tour Invitation

Hi Adrienne,

Thank you for this invitation. I will share it with Doug Benevento and we will get back to you.

Sincerely,

Patrick Davis  
Environmental Protection Agency  
Senior Advisor to the Regional Administrator for Public Engagement  
1595 Wynkoop Street  
Denver, CO 80202  
303-312-6855 (direct)  

Ex. 6

 (cell)

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**From:** Sandoval, Adrienne [<mailto:Adrienne.Sandoval@andeavor.com>]  
**Sent:** Thursday, March 15, 2018 1:02 PM  
**To:** Davis, Patrick <[davis.patrick@epa.gov](mailto:davis.patrick@epa.gov)>  
**Subject:** Site Tour Invitation

Hello Patrick-

Sorry for the delay in getting back to you after our conversation last week.

I would like to extend an invitation to you to others at EPA to tour one of our natural gas processing plants located about 30 minutes outside of Rock Springs, Wyoming. Blacks Fork Plant is a large gas processing plant that can process 740MMscfd and has fractionation capabilities. I would expect that a half a day time block would accommodate the time for a safety orientation, tour and some additional time to talk.

If possible, please let me know several dates would work for your team's schedule and then we can pick one that will work for everyone.

Please don't hesitate to contact me if you have any questions. We look forward to hosting EPA and talking about our operations.

Thanks,

**Adrienne Sandoval | Federal Regulatory Issues Specialist**  
Andeavor | 1801 California St. Suite 1200 Denver, CO 80202  
Office: 

Ex. 6

 Mobile: 

Ex. 6

[Adrienne.Sandoval@andeavor.com](mailto:Adrienne.Sandoval@andeavor.com)

Message

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**From:** John Hasselmann [JohnHasselmann@ipc.org]  
**Sent:** 10/26/2017 8:52:14 PM  
**To:** John Hasselmann [JohnHasselmann@ipc.org]  
**CC:** [REDACTED] **Ex. 6**  
**Subject:** Moving On!!

Hello!

Apologies for the impersonal email but wanted to let you know that my last day with IPC is tomorrow. It has been a great honor to work for such a great organization for the past five years working on issues to grow the electronics manufacturing industry!

I have accepted a position with the American Society of Mechanical Engineers (ASME) as the Managing Director for Government Relations and Engineering Education. Although ASME is headquartered in New York City, I will continue to be based in Washington and manage their office here. ASME is one of the oldest (founded in 1880) standards-developing organizations/professional societies in the U.S., but with a global reach. I am excited to continue to advocate on issues impacting advanced manufacturing while looking towards the future with regards to clean energy, bioengineering, robotics and other issues. I am looking forward to this new opportunity and challenge!

I start with ASME on November 3. My new contact information is below and will be active on that date.

ASME Washington Center  
1828 L Street NW, Suite 810  
Washington, DC 20036

**Ex. 6** (o)  
(c)

hasselmannj@asme.org

Happy Fall!  
John

*John Hasselmann*  
Vice President, Government Relations  
**IPC - Association Connecting Electronics Industries®**  
1331 Pennsylvania Avenue NW, Suite 910  
Washington, DC 20004  
W: **Ex. 6**  
M:  
[www.ipc.org](http://www.ipc.org)

Message

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**From:** Deanna Krupa [DeannaKrupa@ipc.org]  
on behalf of John Mitchell [JohnMitchell@ipc.org]  
**Sent:** 3/1/2017 10:08:55 PM  
**To:** Davis, Patrick [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7fca02d1ec544fbbbd6fb2e7674e06b2-Davis, Patr]  
**CC:** 'Rozsa, Gabe' [Gabe.Rozsa@prime-policy.com]; Graefe, Erin [Erin.Graefe@prime-policy.com]; John Hasselmann [JohnHasselmann@ipc.org]; Fern Abrams [FernAbrams@ipc.org]; Morris, Jeff [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=55c34872e6ea40cab78be910aec63321-Morris, Jeff]  
**Subject:** Thank you  
**Attachments:** F006 letter to Bodine (2).doc; ElectropatingWaste (3).doc

Dear Mr. Davis,

Thank you for meeting with my team earlier this week. We appreciated the opportunity to discuss the negotiated rulemaking on TSCA byproducts and were heartened by the progress already underway.

I understand that you have already been in touch with Fern Abrams regarding a meeting with the Office of Land and Emergency Management (OLEM) on the RCRA Hazardous Waste Generator issue. Thank you on that front as well.

Additionally, I have enclosed some information regarding the other RCRA issue raised during the meeting, the need to revise some of the regulations discouraging the recycling of printed circuit board wastewater treatment sludge. We would be pleased to discuss this issue in more detail during the meeting with OLEM or at some time in the future.

IPC looks forward to working collaboratively with EPA on these and other issues. Please feel free to reach out to me or my staff if there is anything on which we or our members can provide assistance.

Sincerely,  
John Mitchell

John W. Mitchell  
President & CEO  
**IPC - Association Connecting Electronics Industries®**  
3000 Lakeside Drive Suite 105N  
Bannockburn, IL 60015  
+1 847-615-7100 main  
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[JohnMitchell@ipc.org](mailto:JohnMitchell@ipc.org)  
[www.ipc.org](http://www.ipc.org)

## **EPA Finalizing Proposal on Cost Reducing Options for Sludge Disposal**

Electroplating sludge disposal is, more often than not, the number one environmental cost for printed circuit board (PCB) manufacturers and other manufacturing industries that conduct electroplating. The U.S. Environmental Protection Agency (EPA) has publicly committed to proposing a rule that could greatly lower the cost of sludge disposal by exempting it from Resource Conservation and Recovery Act (RCRA) Hazardous Waste Regulations. EPA expects to publish the proposed rule for public comment in January 2006 and has committed to meeting with interested parties during IPC's Printed Circuits Expo, APEX and the Designers Summit this February.

Ever since 1980, sludge generated during the treatment of electroplating wastewater has been a listed hazardous waste under RCRA. As an RCRA hazardous waste, electroplating sludge, also known as F006, can only be treated by heavily regulated RCRA Treatment, Storage, and Disposal Facilities (TSDFs). Unfortunately, most government regulations have a lifetime that far exceeds their useful value to society. In the case of F006, changes in PCB manufacturing processes mean that it's no longer accurate to say that all, or even most, F006 waste contains hazardous levels of cyanide, cadmium and chromium.

The current regulatory structure has resulted in a business environment in which it is cheaper to landfill wastes than it is to recycle them – despite the fact that copper hydroxide sludge from the PCB industry averages 10 to 20 times as much copper as virgin ore.

Wastewater treatment sludge from electroplating operations, predominantly from the metal finishing and PCB industries represent one of the largest sources in the United States of untapped metal-bearing secondary materials amenable to metal recovery. It is estimated that there are about one million tons of wastewater treatment sludges generated each year in the United States from electroplating operations. In spite of this large concentration of recoverable metals, a number of regulatory and non-regulatory factors have resulted in a relatively low (20 percent to 30 percent) recovery rate, compared to the more than 80 percent recovery rate for other metal-bearing hazardous waste, such as spent lead-acid batteries and emission control dust from electric arc furnaces.

The current regulatory situation has resulted in a limited number of facilities in the United States that can accept electroplating waste sludge for recovery or reclamation. Many potential facilities that could recycle electroplating wastewater sludge through metals recovery have been discouraged from recycling by regulatory requirements that result in higher operating costs. Businesses that must balance civic responsibility against responsibility to shareholders often are driven to choose a landfill over recycling, while many IPC members pay a higher price in order to have their sludge recycled rather than sent to a landfill. The result is the opposite of environmental protection and resource conservation. Valuable metals are permanently landfilled or transported longer distances (requiring more energy and causing more pollution), while mining of virgin ore continues.

Now that's all about to change. The IPC, along with the metal finishing industries has for some time been advocating that EPA reconsider the automatic hazardous waste classification of electroplating sludge. Ever since the EPA's Common Sense Initiative was abandoned and other promising initiatives under Project XL languished, circuit board manufacturers have despaired of having a common sense solution to this problem. But in 2003, under the leadership of then Assistant Administrator for the EPA's Office of Solid Waste and Emergency Response, Marianne Lamont Horinko, EPA began work on a rule to put resource conservation and recovery back into RCRA. In 2003, EPA engineers, accompanied by IPC staff, visited Colonial Circuits in Fredericksburg, Va., and Dynamic Details in Sterling, Va., to learn more about the circuit board industry.

Unfortunately, previous efforts to change the F006 designation have been torpedoed by groups expressing concern that the treatment or reclamation of F006 at non-RCRA TSDFs would constitute an unreasonable environmental risk. This point of view incorrectly discounts the fact that reclamation of F006 materials does not handicap a recovery facility's ability to comply with environmental regulations. Recovery and reclamation facilities still must be required to handle materials in a way that is protective of the environment, regardless of the RCRA status of PCB electroplating sludge being recycled. With or without a hazardous waste designation, the handling of the sludge will be subject to a full spectrum of OSHA (Occupational Safety and Health Administration) and EPA standards that protect worker health and safety and the environment.

The EPA is currently in the process of finalizing a proposal which is expected to offer two separate cost reducing options. The first, a conditional exclusion from hazardous waste regulations, has the potential to significantly reduce sludge disposal costs while increasing the opportunity for environmentally beneficial metals recycling. This option, known as 'commodity-like,' would be available only for sludges that, based on high concentration of metals, are considered inherently valuable, i.e. more like a commodity than a waste. Based on current data obtained from a smelter, EPA proposes to establish minimum concentrations of 18 percent copper or 12 percent nickel to qualify for the exclusion. Ion exchange systems used to treat wastewaters from electroplating operations sent off-site for canister and resin regeneration would also be excluded from RCRA hazardous waste regulations.

While the proposed commodity-like exclusion has the potential to significantly increase sludge recycling rates, the metals thresholds are unnecessarily high. Industry members are concerned that while metals prices fluctuate according to market rates, EPA has based its metals thresholds upon data from a single point in time. EPA has also, somewhat arbitrarily, ignored other potential uses for sludge and instead relied solely upon a select group of smelters to determine the criteria for commodity-like sludge.

EPA is also proposing a second 'Tier 2' option, which would provide an alternative RCRA Subtitle C regulatory framework for recyclable electroplating waste. To qualify for the Tier 2, sludges must contain a minimum of 1.4 percent copper or 1.0 percent nickel. Under the alternative framework, sludge generators would enjoy some level of

regulatory relief, but recycling facilities would still need to follow RCRA TSDF requirements. Unfortunately, this option is unlikely to have any significant effect on the economics of recycling.

In addition to the proposed two-tier system, EPA is asking for comments on a number of alternative approaches to determining commodity-like thresholds, including: relying on contract specifications rather than specified concentrations; relying on a periodically adjusted range of concentrations, relying on facility records associated average annual slag concentrations, and relying on facility based mass balance approach to estimate metal recovery rates and demonstration of a useful contribution to recovery process.

Clearly the commodity-like exclusion is the only one that has the potential to save money and reduce the cost for businesses doing the right thing by recycling these valuable metals resources. While the EPA's expected threshold of 18 percent copper would be difficult for many PCB manufacturers to meet on a consistent basis, it is only a proposal. Industry will have the opportunity, in the form of a 60-day comment period, to persuade EPA to adopt a more reasonable definition of commodity-like materials so that more companies can take advantage of the proposed exclusion.

To maximize our opportunity to influence the development of this important regulation, IPC has arranged for EPA Project Manager Jim O'Leary, to meet with our members during IPC's Printed Circuits Expo, APEX and the Designers Summit on February 9. This is your opportunity to directly influence the development of regulatory climate under which your facility operates. Don't miss this chance to save your facility money. For more information, visit [GoIPCShows.org](http://GoIPCShows.org).

June 19, 2006

Susan Bodine  
Assistant Administrator for Solid Waste and Emergency Response  
USEPA Headquarters  
Ariel Rios Building MS 5101T  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460

Dear Ms. Bodine:

IPC –Association Connecting Electronics Industries and its members are extremely disappointed that the EPA has chosen not to go forward with a proposed rule to increase the recycling of electroplating sludge by providing an exemption from regulation as a listed hazardous waste (F006). The F006 listing for printed circuit board sludge remains a regulatory barrier to the economical recycling of this commodity for greater environmental benefits.

IPC is the national trade association for the electronic interconnection industry, and represents 2,400 member companies. In the mid-1990s, EPA's Common Sense Initiative (CSI) identified increasing the recycling of F006 through regulatory relief as a specific goal. Ever since, IPC and its members have been eagerly awaiting a rule proposal. We were subsequently encouraged when EPA identified F006 as the best candidate for regulatory relief in their June 2002, "RCRA Hazardous Waste Delisting: The First Twenty Years" Office of Solid Waste report.

As you know, F006 sludge contains valuable metals at concentrations that far exceed virgin ore. F006 sludge produced during printed circuit board manufacturing typically contains over 10% copper. The current regulatory structure has resulted in a business environment where it is cheaper to landfill wastes than it is to recycle them. Businesses, which must balance civic responsibility against responsibility to shareholders, often are driven to choose a landfill over recycling. Other businesses, choosing to place a premium value on environmental responsibility, do so at a competitive disadvantage. Ironically, due to significant changes in the circuit board manufacturing process, the hazardous constituents upon which the F006 listing was based are no longer commonly found in electroplating sludge from the printed circuit board industry. It is our belief that electroplating sludge, once free from the associated costs of hazardous waste designation, will be more commonly recycled, thus reducing both landfill usage and consumption of virgin ore.



Following the abandonment of the CSI process, some of our member facilities turned to the EPA's project XL in pursuit of common sense regulatory reform. When that effort also failed to result in practical changes, our members became somewhat cynical about EPA's ability to promulgate such a simple, common sense regulation. We were pleased in 2003 when EPA recommitted to promulgating this common sense regulation and when, in response to OMB's Draft Report to Congress on the Cost and Benefits of Federal Regulation, EPA pledged to propose by December 2005 a rule excluding F006, when recycled, from RCRA hazardous waste regulations. We were pleased to support the development of this rule by hosting EPA project staff on several circuit board facility tours, and most recently, by featuring EPA project manager Jim O'Leary as a presenter at our February 2006 industry trade show and conference, where he presented a preview of the proposed rule under review at the Office of Management and Budget.

We were, therefore, extremely disappointed to learn last month that EPA has chosen not to propose this rule. While we had some disagreement with EPA regarding the details of the draft rule, we had looked forward to the opportunity for public review and comment following formal proposal. Now our members are again asking cynically if EPA can ever be trusted to move forward with its promises.

Although we have been told F006 is likely to be addressed as part of the forthcoming Definition of Solid Waste (DSW) regulation, we note that the rule proposed by EPA in October 2003 will not address F006 because it is not, and cannot be, practically recycled onsite or within the same generating industry (printed circuit board manufacture). While we are hopeful that EPA will eventually promulgate a broader DSW rule which excludes from RCRA hazardous waste regulations all legitimate recycling, we are saddened by the ensuing further delay and uncertainty this brings to the decade long quest for sensible regulation of F006 waste. In the absence of definitive EPA action, some of our member facilities have decided to pursue individual delisting petitions. A continued perception of EPA's inability to take action could result in a flood of delisting petitions and could eventually increase the financial incentive to dispose of F006 in landfills.

**We hope that EPA will reconsider its decision not to propose a rule excluding F006 from hazardous waste regulations when recycled.**

Please let me know if there is anything further IPC or the printed circuit board industry can do to help advance this important rule.

Sincerely,

Fern Abrams  
Director of Environmental Policy

cc: Richard Otis, Deputy Associate Administrator, OPEI  
Arthur G. Fraas, Chief, Natural Resources, Energy and Agriculture Branch, OIRA, OMB  
Candice Miller, Chairman, US House of Representatives, Committee on Government Reform,  
Subcommittee on Regulatory Reform

Arthur G. Fraas  
Chief, Natural Resources, Energy and Agriculture Branch  
Office of Information and Regulatory Affairs  
Office of Management and Budget  
New Executive Office Building  
725 17th Street, N.W.  
Washington, D.C. 20503

Candice Miller  
Chairman  
Committee on Government Reform  
Subcommittee on Regulatory Affairs U.S. House of Representatives  
B-373 B Rayburn House Office Building  
Washington, D.C. 20515

Richard Otis  
Deputy Associate Administrator, OPEI  
USEPA Headquarters  
Ariel Rios Building  
1200 Pennsylvania Avenue, N. W.  
Mail Code: 1804A  
Washington, DC 20460

Message

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**From:** Fern Abrams [FernAbrams@ipc.org]  
**Sent:** 3/9/2017 2:53:33 PM  
**To:** Davis, Patrick [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7fca02d1ec544fbbbd6fb2e7674e06b2-Davis, Patr]  
**CC:** Nam, Katherine [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=960947dcfbc944538af795ab8f122cc9-KNAM]; Devlin, Betsy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b76a4bf5afc84459a6bf2a6a4645f40f-BDEVLIN]; Huggins, Richard [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0314e81a1f4843fcbbe0910cfddd53f4-Huggins, Richard]  
**Subject:** RE: IPC meeting with OLEM

Dear Patrick,

I wanted to thank you, Katherine, Richard and Betsy for meeting with us yesterday. We appreciated your willingness to hear about our concerns with the recently published Hazardous Waste Generators rule, specifically those provisions that subject facilities that do not comply with all of the "conditions of exemption," in their generator class to draconian enforcement as unpermitted Treatment, Storage and Disposal Facilities (TSDFs). As discussed in our meeting, we hope to work with EPA in a collaborative manner to address this issue through proposal of a less draconian option.

Fern Abrams  
Director of Regulatory Affairs and Government Relations  
IPC- Association Connecting Electronics Industries  
1331 Pennsylvania Avenue, Suite 910  
Washington, DC 20004

**Ex. 6**

fabrams@ipc.org  
[www.ipc.org](http://www.ipc.org)

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**From:** Davis, Patrick [mailto:davis.patrick@epa.gov]  
**Sent:** Monday, March 6, 2017 4:38 PM  
**To:** Fern Abrams <FernAbrams@ipc.org>  
**Cc:** Huggins, Richard <Huggins.Richard@epa.gov>; Johnson, Barnes <Johnson.Barnes@epa.gov>; John Hasselmann <JohnHasselmann@ipc.org>; 'Rozsa, Gabe' <Gabe.Rozsa@prime-policy.com>; Hulse, Leslie <Leslie\_Hulse@americanchemistry.com>; Hilosky, Nick <Hilosky.Nick@epa.gov>; Nam, Katherine <nam.katherine@epa.gov>; Devlin, Betsy <Devlin.Betsy@epa.gov>; Huggins, Richard <Huggins.Richard@epa.gov>  
**Subject:** RE: IPC meeting with OLEM

Hi Fern,

Yes, indeed we are awaiting your arrival on Wednesday, March 8 at 2:30 p.m. We will be meeting in room 4144 West. Please enter the EPA at the West Building entrance located at 1301 Constitution Avenue.

Participating from the EPA:

Patrick Davis, Office of the Administrator  
Katherine, EPA, OGC  
Betsy Devlin, EPA, OLEM  
Richard Huggins, EPA, OLEM

Thanks,  
Patrick Davis

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**From:** Fern Abrams [<mailto:FernAbrams@ipc.org>]  
**Sent:** Monday, March 6, 2017 4:12 PM  
**To:** Davis, Patrick <[davis.patrick@epa.gov](mailto:davis.patrick@epa.gov)>  
**Cc:** Huggins, Richard <[Huggins.Richard@epa.gov](mailto:Huggins.Richard@epa.gov)>; Johnson, Barnes <[Johnson.Barnes@epa.gov](mailto:Johnson.Barnes@epa.gov)>; John Hasselmann <[JohnHasselmann@ipc.org](mailto:JohnHasselmann@ipc.org)>; 'Rozsa, Gabe' <[Gabe.Rozsa@prime-policy.com](mailto:Gabe.Rozsa@prime-policy.com)>; Hulse, Leslie <[Leslie\\_Hulse@americanchemistry.com](mailto:Leslie_Hulse@americanchemistry.com)>  
**Subject:** RE: IPC meeting with OLEM

Dear Patrick,

I am writing to confirm our meeting on Wed March 8<sup>th</sup> at 2:30 pm. Can you provide a location for the meeting?

Our meeting attendees will be:  
John Hasselmann, IPC VP Government Relations  
Fern Abrams, IPC Director Regulatory Affairs  
Leslie Hulse Assistant General Counsel, American Chemistry Council

Please let me know if you need additional information from us. May I ask who from EPA you expect will be attending?

For your reference and by way of background, I am enclosing the comments on the Hazardous Waste Generator Improvements Proposed Rule that were filed by IPC, ACC and other industrial generators organizations. During the meeting we hope to focus on the issue regarding Conditions for Exemption, discussion of which begins at the bottom of page 6 in the executive summary and in detail on page 14. I provide these only for your reference as we will discuss them during the meeting – please don't feel the need to read through them in advance.

We are looking forward to the meeting and thank you in advance for your time.

Sincerely,

Fern Abrams  
Director of Regulatory Affairs and Government Relations  
IPC- Association Connecting Electronics Industries  
1331 Pennsylvania Avenue, Suite 910  
Washington, DC 20004

Ex. 6

[fabrams@ipc.org](mailto:fabrams@ipc.org)  
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**From:** Davis, Patrick [<mailto:davis.patrick@epa.gov>]  
**Sent:** Thursday, March 2, 2017 1:18 PM  
**To:** Fern Abrams <[FernAbrams@ipc.org](mailto:FernAbrams@ipc.org)>  
**Cc:** Huggins, Richard <[Huggins.Richard@epa.gov](mailto:Huggins.Richard@epa.gov)>; Johnson, Barnes <[Johnson.Barnes@epa.gov](mailto:Johnson.Barnes@epa.gov)>; John Hasselmann <[JohnHasselmann@ipc.org](mailto:JohnHasselmann@ipc.org)>; 'Rozsa, Gabe' <[Gabe.Rozsa@prime-policy.com](mailto:Gabe.Rozsa@prime-policy.com)>  
**Subject:** RE: IPC meeting with OLEM

Hi Fern,

By all means, bring your colleagues. They are welcome at the EPA.

Thanks,  
Patrick Davis

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**From:** Fern Abrams [<mailto:FernAbrams@ipc.org>]  
**Sent:** Thursday, March 2, 2017 12:13 PM  
**To:** Davis, Patrick <[davis.patrick@epa.gov](mailto:davis.patrick@epa.gov)>  
**Cc:** Huggins, Richard <[Huggins.Richard@epa.gov](mailto:Huggins.Richard@epa.gov)>; Johnson, Barnes <[Johnson.Barnes@epa.gov](mailto:Johnson.Barnes@epa.gov)>; John Hasselmann <[JohnHasselmann@ipc.org](mailto:JohnHasselmann@ipc.org)>; 'Rozsa, Gabe' <[Gabe.Rozsa@prime-policy.com](mailto:Gabe.Rozsa@prime-policy.com)>  
**Subject:** RE: IPC meeting with OLEM

Dear Patrick,

Absolutely – we like fast moving balls.

If you are amenable, we would like to bring with us one or two colleagues from other trade associations with which we have been working on this rule. Please let us know if that is ok and we will send you a list of intended attendees.

Fern Abrams  
Director of Regulatory Affairs and Government Relations  
IPC- Association Connecting Electronics Industries  
1331 Pennsylvania Avenue, Suite 910  
Washington, DC 20004  

Ex. 6

  
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**From:** Davis, Patrick [<mailto:davis.patrick@epa.gov>]  
**Sent:** Thursday, March 2, 2017 12:01 PM  
**To:** Fern Abrams <[FernAbrams@ipc.org](mailto:FernAbrams@ipc.org)>  
**Cc:** Huggins, Richard <[Huggins.Richard@epa.gov](mailto:Huggins.Richard@epa.gov)>; Johnson, Barnes <[Johnson.Barnes@epa.gov](mailto:Johnson.Barnes@epa.gov)>; John Hasselmann <[JohnHasselmann@ipc.org](mailto:JohnHasselmann@ipc.org)>; 'Rozsa, Gabe' <[Gabe.Rozsa@prime-policy.com](mailto:Gabe.Rozsa@prime-policy.com)>  
**Subject:** RE: IPC meeting with OLEM

Hi Fern,

Could we please meet at 2:30 p.m. on Wednesday, March 8 in order to keep moving the ball down the field quickly?

Thanks,  
Patrick Davis

---

**From:** Fern Abrams [<mailto:FernAbrams@ipc.org>]  
**Sent:** Wednesday, March 1, 2017 5:12 PM  
**To:** Davis, Patrick <[davis.patrick@epa.gov](mailto:davis.patrick@epa.gov)>  
**Cc:** Huggins, Richard <[Huggins.Richard@epa.gov](mailto:Huggins.Richard@epa.gov)>; Johnson, Barnes <[Johnson.Barnes@epa.gov](mailto:Johnson.Barnes@epa.gov)>; John Hasselmann

<[JohnHasselmann@ipc.org](mailto:JohnHasselmann@ipc.org)>; 'Rozsa, Gabe' <[Gabe.Rozsa@prime-policy.com](mailto:Gabe.Rozsa@prime-policy.com)>

**Subject:** RE: IPC meeting with OLEM

Dear Mr. Davis, Mr. Huggins and Mr. Barnes,

IPC appreciates the opportunity to meet with you to discuss our concerns with the recently issued Hazardous Waste Generator Improvements rule.

We are available next week on Wed, March 8<sup>th</sup> at 2:30 pm or anytime thereafter; on Thursday March 9<sup>th</sup> between 9am and 11 am or at 2:30pm or anytime thereafter; and on Friday March 10 after 2pm. If none of these times are convenient, we can look at the following week.

Additionally, please let us know if it would be ok if we included in the meeting one or two colleagues from other trade associations with which we have been working on this rule.

Regards,

Fern Abrams  
Director of Regulatory Affairs and Government Relations  
IPC- Association Connecting Electronics Industries  
1331 Pennsylvania Avenue, Suite 910  
Washington, DC 20004

**Ex. 6**

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**From:** Davis, Patrick [<mailto:davis.patrick@epa.gov>]

**Sent:** Tuesday, February 28, 2017 5:00 PM

**To:** Fern Abrams <[FernAbrams@ipc.org](mailto:FernAbrams@ipc.org)>

**Cc:** Huggins, Richard <[Huggins.Richard@epa.gov](mailto:Huggins.Richard@epa.gov)>; Johnson, Barnes <[Johnson.Barnes@epa.gov](mailto:Johnson.Barnes@epa.gov)>

**Subject:** IPC meeting with OLEM

Hi Fern,

Thank you for coming by the EPA today. I was a pleasure to meet you. I have copied Barnes Johnson and Richard Huggins from our Office of Land and Emergency Management for the purpose of scheduling a meeting regarding the hazardous waste generator issue.

Please let us know when you and your team would be available to come over to the EPA for a visit.

Sincerely,  
Patrick Davis

Message

**From:** Chergo, Jennifer [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=8D5D1EEF927F4201A164EA01A0D59EEF-CHERGO, JENNIFER]  
**Sent:** 4/9/2018 9:10:01 PM  
**To:** Bob Weaver [bob.weaver@lrewater.com]; Byus Caroline [caroline.byus@lrewater.com]; Chandler-Henry, Kathy [Ex. 6]; [Ex. 6] [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33cc9b05a394429bb80a2978514bad1b]; [Ex. 6]; Linn Brooks [lbrooks@erwsd.org]; Steve Bushong [sjbushong@pbblaw.com]; [Ex. 6]; Merry, Ray [Ray.Merry@eaglecounty.us]; Seth Mason [seth@lotichydrological.com]; Paxson, Timm [Ex. 6]; Almon, Rebecca L. [ralmon@irelandstapleton.com]; Acting Minturn Town Manager [manager@minturn.org]; manager@townofredcliff.org; Dave Kleinkopf [dkleinkopf@battlemountainresort.com]; Bill Andree [Bill.Andree@state.co.us]; Kendall Bakich [Kendall.Bakich@state.co.us]; Tim McGuire [tmcguire@battlemountainresort.com]; melynda.may@state.co.us [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=user4006bd1]; [Ex. 6]; John Woodling [Woodling@colorado.edu]; Scott Burgess [scott@burgessfinewoodworking.com]; Holly Ioff [loff@erwc.org]; Tambi Katieb [Ex. 6]; Cliff Thompson [Ex. 6]; Susan Pollack [Ex. 6]; Pete Denise [pete@vail.net]; Rob Sperberg [rsperberg@colomtnlaw.com]; Kim Gortz [kgortz@csu.org]; Greg Espegren [Ex. 6]; Gary Brooks [brooks@alpinecivil.com]; Kathy Kitzmann [kkitzman@auroragov.org]; Brian Tracy [btracy@erwsd.org]; cbair@oldcastlematerials.com; bill.carlson@eaglecounty.us; Dan Reynolds [dan@rkvlaw.com]; Mercedes Quesada-Embid [membid@coloradomtn.edu]; Darell Wegert [Ex. 6]; Leah Cribari [lcribari@erwsd.org]; ghall@vailgov.com; Justin Hildreth [jhildreth@avon.org]; kbertuglia@vailgov.com; planner1@minturn.org; Siri Roman [sroman@erwsd.org]; Anuschka Bales [Ex. 6]; mike.mcwilliam@eaglecounty.us; barry.smith@eaglecounty.us; Matt Scherr [Ex. 6]; John Widerman [jwiderman@minturn.org]; jcowles@erwsd.org; Warren Smith [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=userf18cb429]; Hinrichs, Dave [dhinrichs@newfields.com]; Sitler, Kerri [ksitler@newfields.com]; Heinze David [dheinze@environcorp.com]; Jeff Groy [Jeff.Groy@cbs.com]; Russell P. Cepko [russ.cepko@cbs.com]; Ipsen, Hank (Hank.Ipsen@bryancave.com [Hank.Ipsen@bryancave.com]; jason.king@coag.gov [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=usera2c9472b]; Miller, Jamie [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=c94ebf3cb5ca4613b68826a5d687876f-Miller, Jam]; Timothy S. Murphy [tim.murphy@pwt.com]  
**CC:** Davis, Patrick [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7fca02d1ec544fbbbd6fb2e7674e06b2-Davis, Patr]  
**Subject:** RE: Eagle Mine Stakeholder Meeting - This Thursday April 12  
**Attachments:** Final agenda 41218 mtg.docx

This is a reminder that our Eagle Mine Stakeholder Meeting is this **Thursday, April 12 from 12:00 - 3:00 pm at the Colorado Mountain College Vail Valley, 150 Miller Ranch Road, Edwards, CO 81632**. I've attached an agenda. We look forward to seeing you there.

-jc

Jennifer Chergo  
Public Affairs Specialist  
U.S. Environmental Protection Agency  
1595 Wynkoop Street, Denver, CO 80202  
(303) 312-6601

**From:** Chergo, Jennifer  
**Sent:** Tuesday, February 6, 2018 1:30 PM

To: 'Bob Weaver' <bob.weaver@lrewater.com>; 'Byus Caroline' <caroline.byus@lrewater.com>; 'Chandler-Henry, Kathy' <Ex. 6>; 'Linn Brooks' <lbrooks@erwsd.org>; 'Steve Bushong' <sjbushong@pbblaw.com>; <Ex. 6>; 'Merry, Ray' <Ray.Merry@eaglecounty.us>; 'Seth Mason' <seth@lotichydrological.com>; 'Paxson, Timm' <Ex. 6>; 'Almon, Rebecca L.' <ralmon@irelandstapleton.com>; 'Acting Minturn Town Manager' <manager@minturn.org>; 'manager@townofredcliff.org' <manager@townofredcliff.org>; 'Dave Kleinkopf' <dkleinkopf@battlemountainresort.com>; 'Bill Andree' <Bill.Andree@state.co.us>; 'Kendall Bakich' <Kendall.Bakich@state.co.us>; 'Tim McGuire' <tmcguire@battlemountainresort.com>; 'Melynda May - DNR' <melynda.may@state.co.us>; <Ex. 6>; 'John Woodling' <Woodling@colorado.edu>; 'Scott Burgess' <scott@burgessfinewoodworking.com>; 'Holly Ioff' <loff@erwc.org>; 'Tambi Katieb' <Ex. 6>; 'Cliff Thompson' <Ex. 6>; 'Susan Pollack' <Ex. 6>; 'Pete Denise' <pete@vail.net>; 'Rob Sperberg' <rsperberg@colomtnlaw.com>; 'Kim Gortz' <kgortz@csu.org>; 'Greg Espegren' <Ex. 6>; 'Gary Brooks' <brooks@alpinecivil.com>; 'Kathy Kitzmann' <kkitzman@auroragov.org>; 'Brian Tracy' <btracy@erwsd.org>; 'cbair@oldcastlematerials.com' <cbair@oldcastlematerials.com>; 'bill.carlson@eaglecounty.us' <bill.carlson@eaglecounty.us>; 'Dan Reynolds' <dan@rkvlaw.com>; 'Mercedes Quesada-Embid' <membid@coloradomtn.edu>; 'Darell Wegert' <Ex. 6>; 'Leah Cribari' <lcribari@erwsd.org>; 'ghall@vailgov.com' <ghall@vailgov.com>; 'Justin Hildreth' <jhildreth@avon.org>; 'kbertuglia@vailgov.com' <kbertuglia@vailgov.com>; 'planner1@minturn.org' <planner1@minturn.org>; 'Siri Roman' <sroman@erwsd.org>; 'Anuschka Bales' <AnuschkaBales@gmail.com>; 'mike.mcwilliam@eaglecounty.us' <mike.mcwilliam@eaglecounty.us>; 'barry.smith@eaglecounty.us' <barry.smith@eaglecounty.us>; 'Matt Scherr' <Ex. 6>; 'John Widerman' <jwiderman@minturn.org>; 'jcowles@erwsd.org' <jcowles@erwsd.org>; 'Warren Smith - CDPHE' <warren.smith@state.co.us>; 'Chergo, Jennifer' <Chergo.Jennifer@epa.gov>; 'Hinrichs, Dave' <dhinrichs@newfields.com>; 'Sitler, Kerri' <ksitler@newfields.com>; 'Heinze David' <dheinze@environcorp.com>; 'Jeff Groy' <Jeff.Groy@cbs.com>; 'Russell P. Cepko' <russ.cepko@cbs.com>; 'Ipsen, Hank (Hank.Ipsen@bryancave.com)' <Hank.Ipsen@bryancave.com>; 'Jason King' <Jason.King@coag.gov>; 'Miller, Jamie' <Miller.Jamie@epa.gov>

**Subject:** Eagle Mine Stakeholder Meeting - Save the Date for April 12

Hello everyone. Please save the date for an Eagle Mine Stakeholder Meeting on **Thursday, April 12 from 12:00 - 3:00 pm at the Colorado Mountain College Vail Valley, 150 Miller Ranch Road, Edwards, CO 81632**. EPA and CDPHE will be providing updates regarding the Records of Decision signed for OUs 1 and 3 last September, resulting work planned for 2018 at the Eagle Mine site, a 2018 Five-Year Review of the Eagle Mine Site and a 2018 Community Involvement Plan update. We'll send a reminder and more formal agenda as the meeting gets closer, but I wanted to get this on everyone's calendar.

Thank you,  
-jc

Jennifer Chergo  
Public Affairs Specialist  
U.S. Environmental Protection Agency  
1595 Wynkoop Street, Denver, CO 80202  
(303) 312-6601



**Eagle Mine Superfund Site  
Stakeholder Meeting  
April 12, 2018**

**12:00 pm - 3:00 pm  
Colorado Mountain College Vail Valley  
150 Miller Ranch Road, Edwards, CO 81632.**

***Introductions***

***Operable Unit 1 (OUI)***

- Summary of OUI Record of Decision Amendment, Sept. 2017 - **Wendy Naugle, CDPHE**
- Site Activities Update & Upcoming 2018 OUI Work - **David Heinz, Ramboll Group; Dave Hinrichs, Newfields**

***Operable Unit 3 (OU3)***

- Summary of OU3 Record of Decision, Sept. 2017 - **Jamie Miller, EPA**
- Upcoming 2018 OU3 Work - **Tim McGuire Battle Mountain Development**

***Other Activities***

- Fifth Five Year Review - **Jamie Miller, EPA**
- Community Involvement Plan Update - **Jennifer Chergo, EPA**

***Open Discussion***

Message

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**From:** Davis, Patrick [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7FCA02D1EC544FBBBD6FB2E7674E06B2-DAVIS, PATR]  
**Sent:** 3/10/2017 9:05:15 PM  
**To:** mmartin@uschamber.com  
**Subject:** Nice to meet you

Hi Mary,

Thank you for coming by the EPA yesterday. Your team represented your member interests very well. They would be proud.

All the best to you.

Patrick Davis  
Senior Advisor to the Administrator  
EPA

Message

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**From:** Davis, Patrick [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7FCA02D1EC544FBBBD6FB2E7674E06B2-DAVIS, PATR]  
**Sent:** 3/14/2017 1:29:51 PM  
**To:** Fern Abrams [FernAbrams@ipc.org]  
**Subject:** RE: EPA Extends Comment Period on Risk Management Plan Rule

Sure thing.

---

**From:** Fern Abrams [mailto:FernAbrams@ipc.org]  
**Sent:** Tuesday, March 14, 2017 9:29 AM  
**To:** Davis, Patrick <davis.patrick@epa.gov>  
**Subject:** RE: EPA Extends Comment Period on Risk Management Plan Rule

Dear Patrick,  
Thanks for sharing this with me.  
Fern Abrams

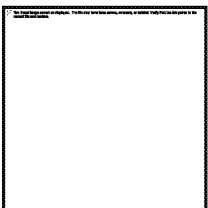
---

**From:** Davis, Patrick [mailto:davis.patrick@epa.gov]  
**Sent:** Tuesday, March 14, 2017 9:26 AM  
**To:** Fern Abrams <FernAbrams@ipc.org>  
**Subject:** FW: EPA Extends Comment Period on Risk Management Plan Rule

FYI

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**From:** U.S. EPA Media Relations [mailto:noreply-subscriptions@epa.gov]  
**Sent:** Monday, March 13, 2017 6:27 PM  
**To:** Davis, Patrick <davis.patrick@epa.gov>  
**Subject:** EPA Extends Comment Period on Risk Management Plan Rule



**CONTACT:**  
[press@epa.gov](mailto:press@epa.gov)

**FOR IMMEDIATE RELEASE**  
March 13, 2017

## EPA Extends Comment Period on Risk Management Plan Rule

**WASHINGTON** – U.S. Environmental Protection Agency (EPA) Administrator Pruitt took action today to reconsider the “Accidental Release Prevention Requirements: Risk Management Programs Under the Clean Air” (“RMP Rule”) and signed an administrative stay to delay the effective date of the rule regarding chemical accident preparedness and prevention, until June 19, 2017.

The 90-day extension will allow time for EPA to consider whether to further extend the effective date of the rule through a

rulemaking action while the Agency reconsiders the rule in response to a petition the agency received in February 2017 from the RMP Coalition.

“As an agency, we need to be responsive to concerns raised by stakeholders regarding regulations so facility owners and operators know what is expected of them,” EPA Administrator Scott Pruitt said as he directed the Agency to extend the comment period.

For more information: <https://www.epa.gov/rmp/final-amendments-risk-management-program-rmp-rule>

R036

If you would rather not receive future communications from Environmental Protection Agency, let us know by clicking [here](#).  
Environmental Protection Agency, 1200 Pennsylvania Avenue NW, Washington, DC 20460 United States

Message

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**From:** Davis, Patrick [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7FCA02D1EC544FBBBD6FB2E7674E06B2-DAVIS, PATR]  
**Sent:** 3/1/2017 6:58:35 PM  
**To:** Fern Abrams [FernAbrams@ipc.org]  
**CC:** Huggins, Richard [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0314e81a1f4843fcbbe0910cfddd53f4-Huggins, Richard]; Johnson, Barnes [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=c39e9338cbf04dc3b4b29f78e5213303-Johnson, Barnes]; John Hasselmann [JohnHasselmann@ipc.org]; John Mitchell [JohnMitchell@ipc.org]  
**Subject:** RE: IPC meeting with OLEM

Thank you.

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**From:** Fern Abrams [mailto:FernAbrams@ipc.org]  
**Sent:** Wednesday, March 1, 2017 1:24 PM  
**To:** Davis, Patrick <davis.patrick@epa.gov>  
**Cc:** Huggins, Richard <Huggins.Richard@epa.gov>; Johnson, Barnes <Johnson.Barnes@epa.gov>; John Hasselmann <JohnHasselmann@ipc.org>; John Mitchell <JohnMitchell@ipc.org>  
**Subject:** RE: IPC meeting with OLEM

Dear Patrick,

It was a pleasure to meet with you as well and we would be delighted to meet with you and Mr. Barnes and Mr. Huggins to discuss our concerns with the recent hazardous waste generator rule. We are checking schedules internally and will be in touch within the next 1-2 days with several proposed times/dates.

Fern Abrams  
Director of Regulatory Affairs and Government Relations  
IPC- Association Connecting Electronics Industries  
1331 Pennsylvania Avenue, Suite 910  
Washington, DC 20004

Ex. 6

[fabrams@ipc.org](mailto:fabrams@ipc.org)  
[www.ipc.org](http://www.ipc.org)

---

**From:** Davis, Patrick [mailto:davis.patrick@epa.gov]  
**Sent:** Tuesday, February 28, 2017 5:00 PM  
**To:** Fern Abrams <FernAbrams@ipc.org>  
**Cc:** Huggins, Richard <Huggins.Richard@epa.gov>; Johnson, Barnes <Johnson.Barnes@epa.gov>  
**Subject:** IPC meeting with OLEM

Hi Fern,

Thank you for coming by the EPA today. I was a pleasure to meet you. I have copied Barnes Johnson and Richard Huggins from our Office of Land and Emergency Management for the purpose of scheduling a meeting regarding the hazardous waste generator issue.

Please let us know when you and your team would be available to come over to the EPA for a visit.

Sincerely,  
Patrick Davis

Message

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**From:** Davis, Patrick [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7FCA02D1EC544FBBD6FB2E7674E06B2-DAVIS, PATR]  
**Sent:** 6/15/2017 9:16:05 PM  
**To:** Martin, Mary [mmartin@USChamber.com]  
**Subject:** RE: Moving On

God Speed, Mary! Stay in touch.

Patrick Davis  
Environmental Protection Agency  
Deputy Assistant Administrator, Office of Land and Emergency Management  
202-564-3103 office

Ex. 6 cell

Information sent to this email address may be subject to FOIA.

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**From:** Martin, Mary [mailto:mmartin@USChamber.com]  
**Sent:** Thursday, June 15, 2017 5:08 PM  
**Cc:** Ex. 6  
**Subject:** Moving On

Friends and Colleagues:

Tomorrow is my last day at the U.S. Chamber. The last four and a half years have provided an incredible professional opportunity, filled with rewarding experiences. And even more than that, I have been lucky enough to work with some of the brightest and most engaging people both within the Chamber and outside of the organization. I am hopeful that our paths will continue to cross in my next endeavor. As of June 20<sup>th</sup>, I will be working for the House Energy and Commerce Committee as Deputy Chief Counsel, Energy and Environment. My personal email is

Ex. 6

Please keep in touch.

Best,  
Mary

**Mary K. Martin** | Energy, Clean Air & Natural Resources Policy Counsel  
U.S. Chamber of Commerce  
1615 H Street, N.W. | Washington, D.C. 20062  
T: Ex. 6 F: 202.463.5521 | M: Ex. 6  
[mmartin@uschamber.com](mailto:mmartin@uschamber.com)